

**IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

CRYSTAL SEAMAN,

Plaintiff,

vs.

FOOD GIANT SUPERMARKETS, INC.,

Defendant.

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Case Number: 2:05-CV-00414-T

**DEFENDANT FOOD GIANT SUPERMARKET, INC.'S
PRE-TRIAL DISCLOSURES**

COMES NOW Food Giant Supermarket, Inc., Defendant in the above-styled cause, and pursuant to Fed. R. Civ. P. 26(a)(3) and the Rule 16(b) Scheduling Order, provides Plaintiff with the following information regarding the evidence that it may present at trial, other than solely for impeachment purposes.

A. The name, address, and telephone number of each witness whom Food Giant expects to present or call at trial.

1. Marcy Wright
P. O. Box 465
Kinston, AL 36453-0465
Phone No. 334-449-1326
2. Aisha Patrick
Piggly-Wiggly Store No. 759
404 S. Second Street
Floral, AL 36442
Phone No. 334-858-3444
3. Anita Patterson
Opp Nursing Facility
115 East Paulk Avenue
Opp, AL 36467
334-493-4558

4. Plaintiff Crystal Seaman
5. Plaintiff's husband, Robert Seaman
6. Lamar Hawkins
PEG, Inc.
Medical Forum Building
950 22nd Street North, Suite 632
Birmingham, AL 35203-1128
Phone No. 205-458-8485

B. Designation of those witnesses whose testimony is expected to be presented by deposition and the pertinent portions of the deposition testimony:

1. Deposition testimony of Plaintiff.

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Page 26, Lines 3-15
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Page 28, Lines 11-25
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Page 30, Lines 1-15 and Lines 24-25
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Page 36, Lines 24-25
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Page 40, Lines 1-5
Page 43, Lines 10-20
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2. Deposition testimony of Plaintiff's husband, Robert Seaman

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Page 9, Lines 1-11 and Lines 19-25
Page 10, Lines 1-12 and Lines 19-25
Page 11, Lines 1-25
Page 12, Lines 1-11
Page 13, Lines 19-24
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Page 20, Lines 1-25
Page 21, Lines 1-25
Page 22, Lines 1-6 and Lines 24-25
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3. Deposition testimony of Dr. Steven R. Beranek

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Page 12, Lines 1-5 and Line 16-23
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Page 23, Lines 1-4
Page 23, Lines 14-16 and Lines 17-23
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C. Identification of each document or exhibits which Defendant may offer at trial.

1. Photograph of the subject ramp, with carpet, attached to Plaintiff's deposition as Defendant's Exhibit 1.
2. Photograph of the subject ramp without carpet.
3. Transcribed recorded statement of Plaintiff.
4. Food Giant incident report.
5. Dothan Neurodiagnostic Center record dated, June 19, 2003.
6. Office note, dated January 12, 2004 from Dr. Beranek releasing Plaintiff to go back to school with no restrictions (Attached as Defendant's exhibit 1 to Dr. Beranek's deposition).
7. September 2, 2004 record from Dr. Beranek's office (attached as Defendant's Exhibit 1 to Dr. Beranek's deposition).
8. October 13, 2004 record from Dr. Beranek's office (attached as Defendant's Exhibit 1 to Dr. Beranek's deposition).
9. Certified copies of Plaintiff's criminal records from Florida.

Defendant reserves the right to object to any of Plaintiff's disclosures 14 days after such disclosures are made, and to supplement its exhibits after Plaintiff identifies her exhibits.

s/M. WARREN BUTLER
s/M. WARREN BUTLER
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ASB-3190-R56-M
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CERTIFICATE OF SERVICE

I do hereby certify that I have on this 2nd day of June, 2006, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of each filing to the following:

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Geneva, AL 36340

David J. Harrison, Esq.
P. O. Box 994
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